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April 20, 2017

Thomas J. Navin

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Telephone Number Portability, CC Docket No. 95-116; North American Numbering Plan Administration, CC Docket No. 92-237; Numbering Resource Optimization, CC Docket No. 99-200; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, WC Docket No. 03-123

Dear Ms. Dortch:

On April 18, 2017, Len Kennedy, Aaron Goldberger, and Rich Fruchterman of Neustar, Inc. ("Neustar"), the undersigned of Wiley Rein LLP as counsel to Neustar, Meredith Senter and David Keir of Lerman Senter PLLC as counsel for Golden Gate Private Equity, Inc. ("GGC"), and Mark Schneider of Sidley Austin LLP as counsel for Hux Investment Pte. Lte. ("GIC Investor"), met with the following representatives of the Federal Communication Commission (the "Commission"): Ann Stevens and Marilyn Jones of the Wireline Competition Bureau, Debra Jordan, Anita Patankar-Stoll, and Gregory Intoccia of the Public Safety and Homeland Security Bureau, and Terry Cavanaugh, Michele Ellison, and Neil Dellar of the Office of General Counsel. On April 19, 2017, Len Kennedy and the undersigned on behalf of Neustar, Meredith Senter and Stephen Coran on behalf of GGC, and Mark Schneider on behalf of GIC Investor, met with Claude Aiken, Commissioner Clyburn's Wireline Legal Advisor, Nicholas Degani, Chairman Pai's Senior Counsel, and Amy Bender, Commissioner O'Rielly's Wireline Legal Advisor.

The purpose of the meetings was to discuss Neustar's Request to Approve New Ownership of the Numbering Administrator, which is pending in the dockets listed above. We emphasized that GGC is a neutral entity under the Commission's rules because it is not affiliated with any telecommunications service provider ("TSP") or any business with an interest in the outcome of numbering administration activities.

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We further explained that to ensure Neustar's numbering administration business would continue to be controlled by an entity with no vested interest in the outcome of the numbering administration activities, GGC has formed a new company, Aerial Investors LLC, to acquire Neustar. Aerial Investors LLC will place its entire ownership interest in Neustar into a voting trust controlled by GGC.¹ The voting trust will be comparable to those the Commission approved in its *Telcordia*² and *Warburg*³ decisions and will insulate GIC Investor and investors other than GGC from involvement in Neustar's numbering administration activities.

In addition, we advised that Neustar will adopt a Code of Conduct that will, among other things, provide for the continued protection of confidential or proprietary information about the numbering administration business, including information related to certain law enforcement activities, from disclosure to TSPs and others. GGC's counsel further represented that Neustar will continue to fulfill its applicable contractual obligations after the closing of the transaction and that, as a long-term investor, GGC does not have any present intention to alter the overall existing management of Neustar.

Finally, we asked that the Commission approve this transaction as expeditiously as possible.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/ Thomas J. Navin
Thomas J. Navin

¹ Request of Neustar, Ex. A.

² *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration*, Order, 31 FCC Rcd. 8406, 8432, App. A (2016).

³ *Request of Lockheed Martin Corporation and Warburg, Pincus & Co. for Review of Transfer of the Lockheed Martin Communications Industry Services Business*, Order, 14 FCC Rcd 19792, 19811 ¶ 31 (1999).



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cc: Claude Aiken
Amy Bender
Terry Cavanaugh
Nicholas Degani
Neil Dellar
Michele Ellison
Gregory Intoccia
Marilyn Jones
Debra Jordan
Anita Patankar-Stoll
Ann Stevens